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Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

Adv. Pro. No. 10-05055 (SMB)

LUCERNE FOUNDATION and DOUGLAS J. RIMSKY in his capacity as Trustee,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

- 1. Fact Discovery shall be completed by: January 15, 2016
- 2. The Disclosure of Case-in-Chief Experts shall be due: February 23, 2016
- 3. The Disclosure of Rebuttal Experts shall be due: March 25, 2016
- 4. The Deadline for Completion of Expert Discovery shall be: <u>June 13, 2016</u>
- 5. Deadline for Service of a Notice of Mediation Referral shall be: <u>August 15, 2016</u>
- 6. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: August 29, 2016
- 7. The Deadline for Conclusion of Mediation shall be: <u>December 28, 2016</u>

Dated: New York, New York December 18, 2015 **BAKER & HOSTETLER LLP**

By: /s/ Keith R. Murphy

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